

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**UNITED STATES POSTAL SERVICE RESPONSES TO ELAINE MITTLEMAN
INTERROGATORIES (EM/USPS-1—14, 18, and 20—26)**
(June 29, 2012)

The United States Postal Service today files its institutional responses to the above-identified interrogatories of Elaine Mittleman, dated June 22, 2012. Each interrogatory is stated verbatim and followed by the response. The Postal Service has filed objections to EM/USPS-15—17, 19, and 27 and a partial objection to EM/USPS-14.

Respectfully submitted,

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**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-1.

How will the hours be determined for a post office to be open? If customers need to be able to use the post office early in the morning and/or at the end of the day, will the post office be open at both times?

RESPONSE

See page 16 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1).

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-2.

If persons conducting business need access to postal services at random times during the day, rather than at a scheduled time, how can they get that access?

RESPONSE

Consistent with the options available to customers today, if the retail window hours of a particular location are not conducive to a customer's immediate need, the customer may access services at another Post Office or obtain services through alternate retail access channels.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-3.

If persons want to have a package picked up by a carrier, how much lead time is needed to request pick-up? If persons are on a deadline and need prompt service to be able to mail a package, what options are available to them to use the Postal Service, rather than an alternative, such as UPS or FedEx?

RESPONSE

With respect to the first question, the Postal Service does not expect that package pick-up by a carrier will be affected by POSTPlan.

With respect to the second question, customers will continue to have the same options available to them today.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-4.

Are the hours of operation of the retail facilities being reduced to achieve cost savings for the Postal Service?

RESPONSE

Please see the response to POIR No. 1, Question 10 and POIR No. 3, Question 2.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-5.

How will the cost savings to the Postal Service of reducing retail hours be determined?
What method will be used to determine the loss of revenue from reducing retail hours?

RESPONSE

Please see the response to POIR No. 1, Questions 10 and 11.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-6.

Does the Postal Service determine the economic savings of reducing retail hours? If so, how are economic savings determined or calculated?

RESPONSE

Please see the response to POIR No. 1, Question 10.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-7.

Does the Postal Service determine or calculate both the costs savings and the economic savings of reducing retail hours?

RESPONSE

Please see the response to POIR No. 1, Question 10.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-8.

What effect will reducing retail hours have on the lease terms and costs of postal facilities? Will the Postal Service include any lease costs or savings in determining the reduced hours for retail facilities?

RESPONSE

The Postal Service does not expect that lease terms and costs associated with the physical aspects of postal facilities will be affected by POStPlan.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-9.

What will happen to the postal facilities in the hours that they will be closed after the reduced hours have been implemented? Are there safety and environmental concerns about having postal facilities closed for a majority of the day?

RESPONSE

With respect to the first question, PTPOs and RMPOs will follow the same policies and procedures as current part-time Post Offices.

With respect to second question, no. There are part-time Post Offices that are currently operational which have not posed any unique safety or environmental concerns.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-10.

Will some postal workers have hours reduced to two or four work hours per day? Will some postal workers have to travel to several retail facilities during each work day?

RESPONSE

It is possible that postal employees will have the option to work reduced hours or travel to more than one facility during the work day. Please also see page 13 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1).

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-11.

Other than any potential cost savings, what advantages to the customers, the postal workers and USPS will result from this plan to reduce retail hours?

RESPONSE

See pages 9-10 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1).

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-12.

What is the status of the final determinations issued by the Postal Service from January 2011 to the present concerning closing post offices?

RESPONSE

See page 1, footnote 1 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1).

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-13.

Will the Postal Service withdraw the final determinations it has issued for post offices that have not closed?

RESPONSE

No. Please see pages 17-19 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1). The Final Determinations, as part of the discontinuance process, will be held in abeyance pending a determination of whether to realign retail window service hours.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-14.

What is the status of the cases remanded by the Postal Regulatory Commission back to the Postal Service?

RESPONSE

A partial objection to this interrogatory has been filed. Further, consistent with the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1) at page 1, footnote 1, non-operational Post Offices will not be part of POStPlan.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-18.

What definition of community does the Postal Service use in determining the effect on the community of a change in service or change or relocation of retail facilities?

RESPONSE

Please see USPS-LR-N2012-2/5, specifically Appendix A – Glossary of Terms.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-20.

Will the Postal Service reconsider or provide an opportunity for a rehearing concerning post offices that closed from the beginning of 2011 to the present?

RESPONSE

No. See page 1, footnote 1 of the Direct Testimony of Jeffrey C. Day on behalf of the United States Postal Service (USPS-T-1).

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-21.

What are the definitions now and with the new plan of main post offices, stations and branches? Will each city have a main post office?

RESPONSE

With respect to the first question, please see USPS-LR-N2012-2/5, specifically Appendix A – Glossary of Terms, for the definitions of Post Office, Classified Branch, and Classified Station. The definitions of these terms will not change as a result of POStPlan.

With respect to the second question, the Postal Service does not use the term “main post office” as used in this interrogatory. However, there are cities that do not currently have a Post Office. This will not change as a result of POStPlan.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-22.

Will the Postal Service provide the same procedures and appeal rights to main post offices, stations and branches for this plan and any other process, including discontinuances and closings?

RESPONSE

The implementation of POStPlan will not affect the policies and procedures set forth in USPS Handbook PO-101 (USPS-LR-N2012-2/5) for the discontinuance of Postal Service–operated retail facilities, except for the changes identified in response to POIR No. 2, Question 14.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-23.

What is the estimate of the Postal Service concerning the impact of this plan on the operating losses of the Postal Service?

RESPONSE

Please see the response to POIR No. 1, Questions 10 and 11.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-24.

What plans or initiatives is the Postal Service considering for postal facilities that are larger than the facilities included in this plan? Will those facilities continue to operate the same hours as the present?

RESPONSE

POStPlan is limited to EAS Level 16 and below Post Offices.

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM-USPS-25.

Will the Postal Service pursue discontinuance or consolidation for postal facilities included in this plan?

RESPONSE

POStPlan will not impact the Postal Service's ability to initiate future discontinuance studies for Post Offices, including RMPOs and PTPOs, pursuant to the criteria and policies established in USPS Handbook PO-101 (USPS-LR-N2012-2/5).

**UNITED STATES POSTAL SERVICE
RESPONSE TO ELAINE MITTLEMAN INTERROGATORY**

EM/USPS-26.

Will the Postal Service discontinue or consolidate postal facilities after it has reduced retail hours at a facility? Is there a two-step process being considered to first reduce hours and then close the facility?

RESPONSE

With respect to the first question, please see the response to EM/USPS-25.

The response to the second question is no.